

Miles N. Clark, Esq.
Nevada Bar No. 13848
KNEPPER & CLARK LLC
5510 So. Fort Apache Rd, Suite 30
Las Vegas, NV 89148
Phone: (702) 856-7430
Fax: (702) 447-8048
Email: miles.clark@knepperclark.com

David H. Krieger, Esq.
Nevada Bar No. 9086
KRIEGER LAW GROUP, LLC
2850 W. Horizon Ridge Parkway, Suite 200
Henderson, NV 89052
Phone: (702) 848-3855, Ext. 101
Email: dkrieger@kriegerlawgroup.com

Counsel for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

LEISA WHITTUM,

Plaintiff,

V.

UNIVERSITY MEDICAL CENTER OF SOUTHERN NEVADA.

Defendants.

Case No. 2:21-cv-01777-JAD-EJY

**STIPULATION AND ORDER TO EXTEND
TIME FOR PLAINTIFF TO FILE MOTION
TO REMAND**

[FIRST REQUEST]

Complaint filed:

Plaintiff Leisa Whittum (“Plaintiff”), by and through her counsel of record, and Defendant University Medical Center Of Southern Nevada (“UMC”) have agreed and stipulated to the following:

1. On September 24, 2021, UMC filed a Petition for Removal removing the case from District Court, Clark County, Nevada [Dkt. 1].

2. Plaintiff's Motion to Remand is due October 22, 2021.

1 Plaintiff and UMC have agreed to extend Plaintiff's motion deadline seven days in order to allow
 2 Plaintiff to consider the facts and circumstances of the pending briefing, and to extend UMC's
 3 deadline to file a reply in support of its petition for fourteen days for the same reasons. As a result,
 4 both Plaintiff and UMC hereby request this Court to further extend the date for Plaintiff to file her
 5 Motion to Remand until **October 29, 2021**, and to extend the date for UMC to file their response
 6 to Plaintiff's motion to remand until **November 11, 2021**. This stipulation is made in good faith,
 7 is not interposed for delay, and is not filed for an improper purpose
 8

9 **IT IS SO STIPULATED.**

10 Dated October 22, 2021

<p>KNEPPER & CLARK LLC</p> <p><i>/s/ Miles N. Clark</i></p> <hr/> <p>Miles N. Clark, Esq. Nevada Bar No. 13848 5510 So. Fort Apache Rd, Suite 30 Las Vegas, NV 89148 Email: miles.clark@knepperclark.com</p> <p>KRIEGER LAW GROUP, LLC</p> <p>David H. Krieger, Esq., SBN 9086 2850 W. Horizon Ridge Parkway, Suite 200 Henderson, NV 89052 Email: dkrieger@kriegerlawgroup.com</p> <p><i>Counsel for Plaintiff</i></p>	<p>KOELLER, NEBEKER, CARLSON & HALUCK, LLP</p> <p><i>/s/ Mark F. Roach</i></p> <hr/> <p>Mark F. Roach, Esq. Nevada Bar No. 8237 Andrew C. Green, Esq. Nevada Bar No. 9399 400 S. 4th Street, Suite 600 Las Vegas, NV 89101 Email: Andrew.green@knchlaw.com Email: Mark.Roach@knchlaw.com</p> <p><i>Counsel for Defendant University of Medical Center of Southern Nevada</i></p>
--	---

20 **ORDER GRANTING**
 21 **STIPULATION TO EXTEND TIME FOR PLAINTIFF TO FILE MOTION TO**
 22 **REMAND AND FOR DEFENDANT TO FILE RESPONSE TO PLAINTIFF'S MOTION**
 23 **TO REMAND**

24 **IT IS SO ORDERED.**

Clayna J. Zouchal
 25 UNITED STATES MAGISTRATE JUDGE

26 Dated: **October 22, 2021**